



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 9
75 Hawthorne Street
San Francisco, California

VIA EMAIL AND U.S. MAIL

July 5, 2011

Edward Modiano
OPOG Project Coordinator
de maximis, inc.
1322 Scott Street, Suite 104
San Diego, CA 92106

Re: EPA comments on OPOG's response to EPA Comments on ROP/WCC OMM Report,
dated April 15, 2011.

Mr. Modiano:

EPA has completed its review of the Omega Chemical Site Potentially Responsible Party (PRP) Organized Group (OPOG)'s *Operations, Maintenance and Monitoring Manual of the Sub-Slab Depressurization System, Omega Chemical Superfund Site, Women's Crisis Center and Regional Occupation Programs Buildings*, dated April 15, 2011 and prepared by Jacob & Hefner Associates, Inc

Background: OPOG submitted an Operations, Maintenance and Monitoring Manual (OMM) for the Sub-Slab Depressurization for Soil Gas Treatment at Women & Children's Crisis Shelter and Regional Occupation Programs on September 13, 2010. EPA provided comments on October 22, 2010. On November 17, 2010 OPOG provided a revised OMM for the SSD system. EPA provided OPOG with comments on January 25, 2011.

The SSD system was modified in December 2010 and again in March 2011. This latest version identified as Revision 3 OM&M, was updated to include the new information regarding the SSD modifications.

OPOG submitted a revised OMM dated April 15, 2011. EPA has completed its review of that document, and provides the following comments:

Comments:

1. Please revise all text to reference the correct facility name: Women's and Children's Crisis Shelter (WCCS), not Women's Crisis Center.

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2. Page 14, Section 4.4.4, SSDB and SSVMP Monitoring, Vapor Monitoring. Please re-evaluate the use of data from PID field vapor monitoring. There are apparent discrepancies between PID data and analytical data reported in the Short Term Mitigation Sampling Report (STMAR) for March 2011. Specifically, PID data for SSDB-17 in Table E1 of the STMAR and the analytical data for SSDB-17 in Table E2 are not consistent. The PID data show relatively low VOC concentrations whereas the analytical data indicate relatively high VOC concentrations. Please review all PID and analytical data to ensure accuracy / consistency and make recommendations for improving the SSD monitoring where inconsistencies are found.
 3. Page 15, Section 2.2.2.1, SSDB-8 Monitoring. The second sentence in this paragraph should be revised to include the statement that any changes in sampling type (field analysis vs. laboratory analysis) and frequency (monthly vs. quarterly) shall be approved by EPA before any changes are implemented. Please note that monthly analytical monitoring of treated effluent from the SSDB-8 GAC and SSDB-17 GAC canisters shall continue until the GAC change out frequency is well understood. Please contact EPA for review and approval before decreasing the monthly analytical monitoring frequency or switching to the use of PID data.
 4. Page 15, Section 2.2.2.1, SSDB-8 Monitoring. Please add a new sentence that states that other SSDBs will require additional monitoring similar to SSDB-8 if they are equipped in the future with GAC canisters for effluent treatment.
 5. Page 16, Section 5, Data Management and Reporting. The first bullet item identifies Sub-Slab Depressurization Monitoring Form. Please include sub-bullets to specifically identify the various monitoring forms provided in Appendix B (see Appendix B comment below).
 6. Page 16, Section 5, Data Management and Reporting. Please add text that requires OPOG to notify EPA within 1 day when an unplanned shut down of the SSD system, or any portion of the SSD system, longer than 72 hours has occurred. OPOG shall notify EPA in advance of any planned shutdown longer than 72 hours.
 7. Appendix B. The 3 sets of SSD monitoring forms are provided for recording different types of data (e.g. the first form records SSDB data; the second form is for recording SSDVMP data; the third form is for recording data from "clusters" of SSDVMP data in the vicinity of specific SSDBs). However, all these forms have the same name. Please assign unique names to the various SSD monitoring forms to help clarify and differentiate the data. Please also designate forms for monthly data vs. quarterly data recording.
 8. Appendix B. Please include a data sheet for recording monthly and quarterly data on SSDB-8 GAC canister influent and effluent in accordance with requirements stated in Sections 4.2.1.1 and 4.2.2.1. Please include this GAC performance data (both PID and analytical results) in STMAR. The same data from the future GAC canister on SSDB-17 should also be included in the STMAR after the GAC canister has been installed

Please provide a revised document, including two hard copies to EPA, within 14 days or by July 20, 2011.

If you have any questions about this letter, please contact me at (415) 947-4183.

Sincerely,

A handwritten signature in cursive script that reads "Lynda Deschambault".

Lynda Deschambault
Superfund Remedial Project Manager

Cc VIA EMAIL:

Stephanie Lewis, California EPA Department of Toxic Substances Control
Tom Perina, Ch2MHill